

BRETT L. TOLMAN, United States Attorney (#8821)
MICHAEL P. KENNEDY, Assistant United States Attorney (#8759)
Attorneys for the United States of America
185 S. State Street, Ste. 300 • Salt Lake City, Utah 84111
Telephone: (801) 524-5682 • Facsimile: (801) 524-4475
e-mail: michael.kennedy@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHNNY RAYMOND,
DANNY LEO a/k/a DANNY ETO,
TONY MITCHELL,
and
~~DINO NICK MITCHELL~~, *per*

Defendants.

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COMPLAINT

VIO. 18 U.S.C. § 2315
Possession of Stolen Securities

18 U.S.C. § 2
Aiding and Abetting

Before a United States Magistrate Judge for the District of Utah, appeared the undersigned, who on oath deposes and says:

COUNT 1

On or about February 19, 2007, in the Central Division of the District of Utah and elsewhere,

JOHNNY RAYMOND,
DANNY LEO a/k/a DANNY ETO
TONY MITCHELL,
~~and~~
~~DINO NICK MITCHELL,~~

Reed

the defendants herein, did possess, conceal and store securities the value of which is \$5,000 or more, to wit, United States Savings Bonds in the name of J.P., an individual, valued at approximately \$700,000 (seven-hundred-thousand dollars), knowing the same to have been stolen, and which securities had crossed a State boundary after having been stolen, and did aid and abet therein, in violation of 18 U.S.C. § 2315 and 18 U.S.C. § 2 and punishable thereunder.

Complainant states that this complaint is based on information obtained through investigation consisting of the following:

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI). I have been so employed for over sixteen (16) years. I am currently assigned to the Salt Lake City Division. I am familiar with the facts concerning the theft and interstate transportation of approximately \$700,000 in stolen United States (U.S.) Savings bonds from the State of California to the State of Utah via passenger train on February 19, 2007, and the possession of these stolen bonds by Johnny Raymond, Danny Leo, Dino Nick Mitchell, and Tony Mitchell.

2. The contributors to the information contained herein are your affiant, other SAs of the FBI, and Police Officers with the Helper City, Utah Police Department. Not all of the facts surrounding this matter are contained herein; rather, only those facts establishing probable cause that Johnny Raymond, Danny Leo, Dino Nick Mitchell, and Tony Mitchell possessed approximately \$700,000 in stolen U.S. Savings Bonds, knowing them to be stolen, and which savings bonds had crossed a State boundary after having been stolen, of Title 18 United States Code (U.S.C.), Section 2315.

3. At approximately 9:50 a.m., on February 19, 2007, the Helper City Police Department received a telephone call from officials from AMTRAK, a passenger train line, who advised that they were removing five (5) passengers from the train at the Helper, Utah depot for smoking marijuana on the train, and because one of the five (5) had inappropriately touched a female passenger.

4. Police Officers with the Helper City Police Department arrived at the depot to meet the five (5) removed passengers. The passengers identified themselves as Johnny Raymond, Danny Leo, Dino Nick Mitchell, Tony Mitchell and Shawn Mitchell. A drug sniffing dog, accompanying the police officers, reacted strongly to two (2) of several travel bags belonging to the five (5) passengers. Police officers searched the bags, and inside of a small, black, duffle style bag was located a small cardboard box. Inside the box were numerous U.S. Savings Bonds, all issued to a J.P. (an individual whose full

identity is known to me), of Sparks, Nevada. The Helper City Chief of Police asked the five (5) passengers who was the owner of the box. Initially all five (5) denied owning the box. Johnny Raymond then stated that the box belonged to all of them, and that they were taking it to Chicago. After initially stating he did not know to whom the box was being delivered, after further questioning, Johnny Raymond stated that he was taking the box to his uncle, who was in the hospital in Chicago. Johnny Raymond said he did not know the person listed on the U.S. Savings Bonds. The five (5) passengers were detained, and transported to the Helper City Police Department.

5. On February 19, 2007, at approximately 10:50 a.m., the duty agent for the Salt Lake City Division of the FBI received a telephone call from the Helper City Police Department advising that they had detained five (5) males, who were in possession of over \$700,000 in U.S. Savings Bonds. Agents from the FBI and Immigration and Customs Enforcement (ICE) responded to the Helper City Police Department.

6. The Sparks, Nevada Police Department was contacted, and they advised that on December 16, 2006, J.P.'s home was burglarized. Taken from J.P.'s home was a safe containing jewelry, valuable coins, deeds, and \$750,000 in U.S. Savings Bonds and cash.

7. On February 19, 2007, Johnny Raymond, Danny Leo, Dino Nick Mitchell, Tony Mitchell, and Shawn Mitchell were interviewed by Agents from the FBI and ICE, and officers from the Helper City Police Department. After being advised of their

Miranda rights, and agreeing to answer questions without an attorney present, each interviewee stated that they left Phoenix, Arizona with the other four men, and drove to Sacramento, California, where they spent the night, then boarded the AMTRAK train the next day, en route to Chicago, Illinois.

8. Johnny Raymond was interviewed and he additionally stated as follows:

Raymond was aware of the existence of the U.S. Savings Bonds, but denied knowing they were stolen. They were taking the U.S. Saving Bonds to Chicago to have them laundered. On the train, Johnny Raymond overheard one side of a conversation between Danny Leo and someone Danny Leo was speaking with on the telephone, where Danny Leo was talking about laundering the U.S. Savings Bonds. Approximately one week ago, Johnny Raymond and Danny Leo were in the post office, and Johnny Raymond witnessed Danny Leo place three (3) of the U.S. Savings Bonds into an envelope, and mail them to Chicago. Tony Mitchell knows the name of the person in Chicago to whom the U.S. Savings Bonds were to be delivered for laundering.

9. Danny Leo was interviewed and he additionally stated as follows: The bag in which the U.S. Savings Bonds were found belonged to Johnny Raymond. Danny Leo was going to Chicago to visit a friend named Steve Costello. A search of Danny Leo's wallet disclosed a United States Postal Service express mail receipt, dated 02/14/2007, to S. Costello. On the receipt, Danny Leo wrote his name as "Danny Eto" and listed an address

not his own. Danny Leo acknowledged he filled out the receipt, but stated that he sent photographs, not U.S. Savings Bonds.


10. Tony Mitchell was interviewed and he additionally stated as follows: Danny Leo told him that the U.S. Savings Bonds were stolen, and that he was taking them to a man named Stalli (phonetic) in Chicago to have them laundered. Tony Mitchell also overheard a conversation between Danny Leo and Johnnie Raymond where they were discussing taking the U.S. Savings Bonds to a man in Chicago. He stated that Dino Nick Mitchell knew that the U.S. Savings Bonds are stolen. Tony Mitchell was not going to be paid for helping deliver the U.S. Savings Bond, but was instead to be treated to a nice time in Chicago. The telephone number for Stalli (phonetic) can be found in Danny Leo's cell phone.

11. Dino Nick Mitchell was interviewed and advised as follows: Dino Nick Mitchell denied any knowledge of the bonds prior to being shown them by the police. Dino Nick Mitchell does not know to whom they belong. Danny Leo was going to Chicago to see his friend Stalli (phonetic) Costello whose wife was in the hospital. When the police found the U.S. Savings Bonds at the train depot, Johnny Raymond told the police that it was his (Johnny Raymond's) bag, and that he (Johnny Raymond) was taking the U.S. Savings Bonds to someone in Chicago.

12. Based upon the facts herein, your affiant believes there is probable cause that Johnnie Raymond, Danny Leo, ~~Dino Nick Mitchell~~^{beed}, and Tony Mitchell violated federal law, to wit, Title 18 U.S.C., section 2315, Interstate Possession of Stolen Property.

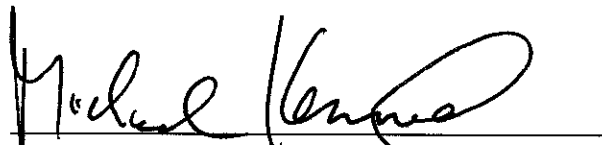

TODD J. ARGYLE, Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME this 21 day of February, 2007.


BROOKE C. WELLS
United States Magistrate Judge

APPROVED:

BRETT L. TOLMAN
United States Attorney


MICHAEL KENNEDY
Assistant United States Attorney